14.1.1.1 1120

PINTLAR CORPORATION
1005 W. McKinley (208) 784-1321
P.O. Box 480 Fax (208) 783-6621
Kellogg, Idaho 83837

Dec. 3, 1993

Ms. Becky Goehring
U.S. EPA
422 W. Washington St.
Boise, Idaho 83702

RE: Bunker Hill Superfund Site - Submittal of Asbestos Abatement Work Plan and Notification of Demolition and Renovation

Dear Ms. Goehring:

Enclosed please find the subject plan and notification form for asbestos abatement at the Residue Floor at the Zinc Plant. The Residue Floor building is a part of a larger structure at the Zinc Plant (see figure 1). We will be removing asbestos from some pipes within the Residue Floor building. We have tentatively scheduled the abatement work to begin the 16th of Dec. 1993 dependent upon receipt of your written approval.

Should you have any questions regarding this information please call Jim Hodge at 784-1321.

Sincerely

Antonio J. Chavez
Vice President

encl

cc: Jim Hodge
Scott Peterson
Ed Whitley

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14.1.1.1 1120

SUBMIT TO: USEPA
422 W. WASHINGTON ST.
BOISE, IDAHO 83702

NOTIFICATION OF DEMOLITION AND RENOVATION

OPERATOR PROJECT#	POSTMARK	DATE RECEIVED	NOTIFICATION #

I. TYPE OF NOTIFICATION (o-original R-revised C-cancelled): 0

II. FACILITY INFORMATION

OWNER NAME:	Pintlar Corporation		
Address:	1005 W. McKinley Ave., P. O. Box 480		
City:	Kellogg	State: ID	Zip: 83837
Contact:	Jim Hodge/Tony Chavez		Phone: 784-1321
REMOVAL CONTRACTOR:	Pintlar Corporation		
Address:	1005 W. Mckinley Ave.		
City:	Kellogg	State: ID	Zip: 83837
Contact:	Jim Hodge		Phone:
OTHER OPERATOR:			
Address:			
City:		State:	Zip:
Contact:			Phone:

III. TYPE OF OPERATION (D-Demolition O-ordered demolition R-renovation E-emergency renovation): D

IV. IS ASBESTOS PRESENT? yes, friable pipe wrap

V. FACILITY DESCRIPTION

Bldg. Name:	Bunker Hill Smelter Complex		
Address:	zinc plant -- Government Gulch		
City:	Kellogg	State: ID	County: Shoshone
Site Location:	Bunker Hill Superfund Site		
Building size:	270' L x 45'W x50' H	# of Floors: 2	Age in Years: 66
Present Use:	none	Prior Use:	purification of ZN

VI. PROCEDURE, INCLUDING ANALYTICAL METHOD, IF APPROPRIATE, USED TO DETECT THE PRESENCE OF ASBESTOS CONTAINING MATERIALS:

Sample of pipe wrap was taken and analyzed by polarized light and phase contrast miscrospy.

VII. APPROXIMATE AMOUNT OF ASBESTOS INCLUDING:	RACM to be Removed	Nonfriable Asbestos Material Not To Be Removed		Indicate Unit of Measureme Below	
1. Regulated ACM to be removed 2. Category I ACM Not Removed 3. Category II ACM Not Removed		Cat I	Cat II	Unit	
Pipes				LnFt: 960	LnM:
Surface Area				SqFt:	SqM:
Vol Racm Off Facility Component				CuFt:	CuM:

VIII. SCHEDULED DATES ASBESTOS REMOVAL	Start: 12-16-93	Completion: 12-24-93
IX. SCHEDULED DATES DEMO/RENOVATION	Start: 12-27-93	Completion: Unknown

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BOISE, IDAHO 83702

NOTIFICATION OF DEMOLITION AND RENOVATION (continued)

X. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK, AND METHOD(TO BE USED:

Following ACM removal from pipes, wood and steel in building will be salvaged.

XI. DESCRIPTION OF WORK PRACTICES AND ENGINEERING CONTROLS TO BE USED TO PREVENT ASBESTOS EMISSIONS AT THE DEMOLITION/RENOVATION SITE:

Level C full-face personal protection and glove bag procedures
(see attached work plan for details)-

XII. WASTE TRANSPORTER #1

Name:	Pintlar Corporation		
Address:	1005 W McKinley Ave., P. O. Box 480		
City:	Kellogg	State: ID	Zip: 83837
Contact Person:	Jim Hodge		Phone: 208-784-132

WASTE TRANSPORTER #2

Name:			
Address:			
City:		State:	Zip:
Contact Person:			Phone:

XIII. WASTE DISPOSAL SITE

Name:	Bunker Hill Smelter Complex; zinc plant concentrate storage		
Address:	zinc plant in Government Gulch		
City:	Kellogg	State: ID	Zip: 83837
Telephone:	784-1321		

XIV. IF DEMOLITION ORDERED BY GOVERNMENT AGENCY, IDENTIFY AGENCY

Name:		Title:	
Authority:			
Date of Order:		Date Ordered to Begin:	

XV. FOR EMERGENCY RENOVATIONS

Date and Hour of Emergency:

Description of the Sudden, Unexpected Event:

Explanation of how the event caused unsafe conditions or would cause equipment damage or an unreasonable financial burden:

XVI. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND OR PREVIOUSLY NONFRIABLE ASBESTOS MATERIAL BECOMES CRUMBLED, PULVERIZED, OR REDUCED TO POWDER:

All abatement procedures consistent with NESHAP guidelines would be followed to remediate the material. If any unexpected ACM is found it will be handled in a manner consistent with NESHAP requirements pertaining to regulated asbestos containing materials (RACM)

SUBMIT TO: USEPA
422 W. WASHINGTON ST.
BOISE, IDAHO 83702

NOTIFICATION OF DEMOLTION AND RENOVATION (continued)

XVII. I CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF THIS REGULATION (40 CFR PART 61, SUBPART M) WILL BE ON-SITE DURING THE DEMOLITION OR RENOVATION, AND EVIDENCE THAT THE REQUIRED TRAINING HAS BEEN ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION DURING NORMAL BUSINESS HOURS. (November 20, 1991)

(Signature of Owner/Operator) 12/3/93 (Date)

XVIII. I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT.

(Signature of Owner/Operator) 12/3/93 (Date)

ASBESTOS REMOVAL WORK PLAN

ZINC PLANT RESIDUE FLOOR

BUNKER HILL SUPERFUND SITE

Prepared For:

PINTLAR CORPORATION

TABLE OF CONTENTS

1.0 INTRODUCTION

The purpose of this work plan is to outline the methods of handling and disposal of Asbestos Containing Materials (ACM) during remedial activities to be conducted on the Residue Floor at the Zinc Plant within the Smelter Complex of the Bunker Hill Superfund Site. The methodologies and remedial actions developed in conjunction with this work plan will provide prudent environmental protections and maintain the health and general welfare of on-site employees, contractors and near-by residents.

The Residue Floor ACM removal project is being conducted in conjunction with the wood and steel salvage project for the Smelter Complex.

2.0 GENERAL METHODOLOGY

This section is intended to outline the concepts pertaining to the handling and disposal of ACM during the Residue Floor ACM removal project.

A number of factors are to be considered during the removal process including: The fugitive dust control measures, the present condition of the structure, the location of the designated on-site repository and the levels of personnel protection.

The fugitive dust control measures for the ACM removal will include the use of water to control air borne emissions. The ACM will be wet down prior to the start of removal procedures and will be wet down periodically throughout the work day to ensure that no visible emissions are released during the abatement project. Air sampling will be conducted to determine levels of protection and worker exposures.

The structural integrity of the Residue Floor building is such as to allow the safe removal of ACM without jeopardizing worker safety.

The distance of the structure from the designated ACM repository area is an important factor in determining the method to be used to move the ACM from the point of removal to its final resting place within the Smelter Complex. The ACM removed from the Residue Floor structure will be transported to the Concentrate Storage Facility at the Roaster Floor at the Zinc Plant (see figure 1). The ACM will be transported from the Residue Floor to the Concentrate Storage Facility in the sealed glovebags used for the actual remediation. The ACM removed from the structure will be placed directly into the glovebags. When the bag has been filled it will be placed in a clearly mark heavy duty plastic bag and sealed with duct tape, placed on a truck for transport to the repository location.

3.0 ASBESTOS REMOVAL PROCEDURES

This section will cover the set-up and work practices for the removal of ACM for the Residue Floor at the Zinc Plant. Notification of ACM abatement activity will be made to EPA consistent with Section 4.0 of this plan prior to beginning the removal action. Asbestos exposure monitoring will be conducted on the asbestos abatement operations to determine the level of airborne asbestos during the asbestos removal project.

The first step in the remediation project will be to clean up any ACM on the ground in the area to be remediated prior to starting the ACM abatement operations. Any visible ACM on the ground will be collected and placed in a plastic bag and taken to the repository location.

The Residue Floor abatement removal actions will include friable asbestos on pipes that must be removed prior to wood and steel salvage. All abatement operations will be conducted in such a manner as to allow no visible emissions during the project.

3.1 ACM REMOVAL PROCESS

The Residue Floor ACM will be removed using the following method. All standard glovebag procedures will be followed,any damaged or broken ACM on the pipes to be remediated will first be wrapped in plastic and duct taped. The area of pipe to be glovebagged will be sprayed with an amended water solution prior to any work being done. All pipe that has not been damaged will be wrapped with duct tape at each location that a glovebag will be attached. All necessary tools and equipment will be brought into the area before work begins and the work area will be roped or taped off and warning signs posted. There will be a two man work crew at all times during the Residue Floor ACM abatement. After the pipes have been abated the pipes themselves will remain in place.

3.2 ACM DISPOSAL

The removed and bagged ACM will be transported to the lower level of the Concentrate Storage Facility. This lower level has concrete floors and walls and lies below the footprint of the clay cap. The lower level will be filled with slag and soil as the facility is closed.

4.0 NOTIFICATION OF ACTIVITIES

The presence of threshold quantities of Regulated Asbestos Containing Material (RACM) triggers National Emission Standards for hazardous Air Pollutants (NESHAP) notification and ACM emission controls.

Notification of ACM removal activities will be provided to EPA and the IDHW on scene coordinator prior to project initiation.

The notification form will be filed 10 working days prior to the start of abatement operations.

The notice to perform ACM abatement operations will be filed on the NOTIFICATION OF DEMOLITION AND RENOVATIONS form (see Attachment A) and submitted to:

Ms Becky Goehring
U.S. EPA
422 W. Washington St.
Boise, Idaho 83702

5.0 TRAINING REQUIREMENTS

Protection of on-site personnel from hazardous materials is of critical importance. Prior to being allowed to work on-site, all personnel must have successfully completed the 40 hour OSHA approved hazardous materials health and safety training consistent with the requirements of 29 CFR parts 1910.120 and 1926, including the 8 hours of refresher training annually. Personnel working on ACM abatement activities must have also completed at a minimum, the 32 hour Asbestos Worker training with supervisors obtaining the Asbestos Site Supervisor training courses. Both courses must meet the EPA AHERA training requirements, including the 8 hours of refresher training annually.

6.0 PERSONAL PROTECTION

The level of protection to be worn by field personnel will be defined and controlled by the Site Manager, Health and Safety Manager and Health and Safety Officer. Protection may be upgraded as site conditions require. The decision to change the level of protection will be based on the analysis of monitoring data and the Permissible Exposure Levels (PEL's). Based on the results of the personal air monitoring data, project tasks may be upgraded as

necessary throughout the course of the project. Level C with full face respiratory protection will be implemented at the start-up of the project.

6.1 RESPIRATORY PROTECTION

Respiratory protection will be employed at all times during the asbestos abatement project utilizing full face respirators. Workers may be up graded to higher levels of respiratory protection should air monitoring analytical data indicate the need.

Level C - Full-Face air purifying respirator with high efficiency particulate (HEPA) filter.

6.2 CLOTHING

The type of equipment used and the overall level of protection should be reevaluated periodically as the amount of information about the site increases, and as workers are required to perform different tasks. Personnel should be able to upgrade their level of protection if, after discussion with the HSM/HSO, they feel it is necessary and the HSM/HSO approves.

Level C clothing consists of:

* Cotton Coveralls and/or Tyvek suits
* Leather or rubber work boots (steel toed)
* Full-face NIOSH approved air purifying respirator with high efficiency particulate (HEPA) filter
* Cotton gloves
* Rubber or Nitryl gloves
* Duct tape to seal wrists at the sleeve and ankles at pant cuffs
* Hard hats

7.0 MONITORING

Airborne emissions of asbestos or particulates are not anticipated during the Residue Floor asbestos abatement project. Surveillance is for the purpose of verifying that site personnel, visitors and nearby residents are not exposed to particulate contaminants in concentrations of concern. Surveillance will include personnel monitoring.

Personal air samples will be collected on workers conducting the ACM removal to ensure that workers are not exposed to air borne fibers above the acceptable levels. Samples will be collected daily on at least one member of each work crew and analyzed for total asbestos fiber content. Additional personal air samples will be collected at random intervals and analyzed for lead, zinc, cadmium and arsenic.

Samples will be collected using personal air pumps affixed at the waists of the workers with tubing attached to collection filters in the breathing zone. Sampling time will be for the duration of a work shift, typically eight hours.

An air flow of 1000 ml/min will be used for the collection of samples for heavy metals analysis and an air flow of 1000 to 2500 ml/min for asbestos analysis. The personal air pumps will be calibrated, used and maintained in accordance with the manufacturer's specifications. The personal air monitors will be calibrated before and after each use and the results will be recorded.

Additional testing or analysis may be required dependent upon the criteria involved.

TARGET SHEET: Oversized Document

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Asbestos Abatement Removal and Disposal Location Map

Bunker Hill Superfund Site

Region 10
1200 Sixth Ave.
Seattle, WA 98101